



— LAW OFFICES OF —
JACQUELINE E. CISTARO

325 Broadway · Suite 505 · New York, NY 10007 · 125 Half Mile Road · Suite 200 · Red Bank, NJ 07701
T: 646.253.0583 · F: 646.224.9618 · C: 732.642.0598 · E: JEC@cistarolawfirm.com
www.cistarolawfirm.com

April 11, 2023

SUBMITTED ECF

The Hon. John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Jarel Sable, 22 Cr. 409 (JGK) and 17 Cr. 511 (JGK)

Your Honor:

I represent Jarel Sable in the above-referenced matters. Our pre-trial motions are due on April 14, 2023, however, we had numerous technical difficulties in accessing some of the surveillance videos containing 7 hours of footage. A review of all of the surveillance videos is necessary as it concerns our pre-trial motions. We respectfully request an extension of the deadlines. We propose that defense motions be due on May 5, 2023, and the government's motions be due on June 16, 2023, as AUSA Brandon Thompson will be on trial. The government consents to this application for an extension.

Thank you for your time and consideration.

Respectfully submitted,

s/ Jacqueline E. Cistaro

cc: All Counsel

APPLICATION GRANTED
SO ORDERED

John G. Koeltl, U.S.D.J.

4/11/23